

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:
	: Criminal No.
v.	:
	: Violations:
LUIS MARIA GOMEZ-LOPO	:
VERONICA GURRICHARRI	: 21 U.S.C. § 846 (Conspiracy to possess with
	: with intent to distribute heroin - 1 count)
	:
	: 21 U.S.C. § 841(a)(1) (Possession with intent
	: to distribute heroin - 1 count)
	:
	: Notice of Forfeiture

**INDICTMENT**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

1. From at least in or about April 2003 through on or about May 5, 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

LUIS MARIA GOMEZ-LOPO  
and  
VERONICA GURRICHARRI

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute more than one kilogram, that is approximately three kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**MANNER AND MEANS**

2. It was part of the conspiracy that defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICHARRI were drug couriers for a heroin organization which

transported heroin from Panama to the Philadelphia area for later sale and distribution.

It was further a part of the conspiracy that:

3. Defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI were recruited in Spain to carry drugs into the United States for a fee of approximately \$12,500.

### OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about April 2003, defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI flew from Madrid, Spain to Panama City, Panama. Defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI traveled with their 17 month old daughter.

2. In or about April 2003, while in Panama City, Panama, defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI received two suitcases containing heroin hidden in the linings.

3. On or about May 2, 2003, defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI flew from Panama City, Panama to Miami, Florida, with the two suitcases containing the hidden heroin.

4. On or about May 3, 2003, defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI flew from Miami, Florida, to Philadelphia and then traveled to New York City by Greyhound bus.

5. On or about May 5, 2003, defendants LUIS MARIA GOMEZ-LOPO and VERONICA GURRICARRI returned to Philadelphia by Greyhound bus with the two suitcases

containing the hidden heroin.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2003, at Philadelphia, in the Eastern District of Pennsylvania,  
defendants

LUIS MARIA GOMEZ-LOPO  
and  
VERONICA GURRICHARRI

knowingly and intentionally possessed with intent to distribute more than one kilogram, that is  
approximately three kilograms, of a mixture or substance containing a detectable amount of  
heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

NOTICE OF FORFEITURE

As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in Counts One and Two of this Indictment, defendants

LUIS MARIA GOMEZ-LOPO  
and  
VERONICA GURRICHARRI

shall forfeit to the United States:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations of Title 21, United States Code, as charged in this Indictment, and

(b) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this Indictment.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney